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 August 13, 2024

**VIA ECF**

Honorable John G. Koeltl, U.S.D.J.  
 United States District Court, S.D.N.Y.  
 500 Pearl Street, Courtroom 1A  
 New York, NY 10007

Re: *SOL-MM III LLC v. JPMorgan Chase Bank, N.A., et al.*, No. 1:23-cv-06479 (JGK)

Dear Judge Koeltl:

We represent defendants JPMorgan Chase Bank, N.A., D5 Hawks LLC, WE Tahoe 1 LLC and WE Tahoe 2 LLC (collectively, the “JPM Defendants”) in the above-referenced matter. Pursuant to Your Honor’s Individual Practices II(G), and in order to aid the Court, the JPM Defendants respectfully request oral argument on their motion to dismiss the second amended complaint.

Respectfully yours,

*/s/ Janice Mac Avoy*

Janice Mac Avoy

KRAMER LEVIN NAFTALIS & FRANKEL LLP

*/s/ William J. Trunk*

William J. Trunk  
*Co-counsel for the JPM Defendants*

Cc: counsel of record (via ECF)